

## **EXHIBIT 14**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE DIGITAL ADVERTISING  
ANTITRUST LITIGATION

No. 21-md-3010 (PKC)

*This document relates to:*

THE STATE OF TEXAS, *et al.*,

*Plaintiffs,*

- against -

GOOGLE LLC,

*Defendant.*

No. 21-CV-6841 (PKC)

**PLAINTIFF STATES' INITIAL DISCLOSURES**

The States of Texas, Alaska, Arkansas, Florida, Idaho, Indiana, Louisiana, Mississippi, Missouri, Montana, Nevada, North Dakota, South Carolina, South Dakota, and Utah, and the Commonwealths of Kentucky and Puerto Rico (collectively referred to hereafter as “Plaintiff States” or “States”), hereby make the following initial disclosures under Federal Rule of Civil Procedure 26(a)(1) and Pre-Trial Order No. 5 (Doc. 394 in 21-md-3010). These disclosures are based on information currently available to the Plaintiff States and represent their good-faith efforts to identify: (1) persons likely to have discoverable information that may be used to support the Plaintiff States’ claims in this action, and (2) documents and electronically stored information that may be used to support the Plaintiff States’ claims in this action.

The Plaintiff States reserve the right to supplement and correct these disclosures as discovery proceeds under Federal Rule of Civil Procedure 26(e) and Pre-Trial Order No. 5. These disclosures are not intended to waive any objections that the Plaintiff States may have regarding the use or admissibility of any disclosed information, whether during discovery or trial, and these disclosures do not constitute a waiver of attorney–client privilege, attorney work product protection, or any other applicable privilege or protection.

Pursuant to Rule 26(a)(1)(A)(i), Appendix A identifies those entities and related individuals known to the Plaintiff States at this time who likely have discoverable information that the Plaintiff States may use to support their claims.

Pursuant to Rule 26(a)(1)(A)(ii) and without waiving any objections to relevance, privilege, or admissibility of these materials or agreeing that they are required to be disclosed, the Plaintiff States possess the following materials that they may use to support their claims: documents and data submitted to the Plaintiff States by Google and third parties, including responses to Civil Investigative Demands. These materials are located or available at the offices of the respective Plaintiff States. The Plaintiff States may also use: (i) publicly available documents or data, and (ii) documents and information produced by Google and third parties in this litigation to support their claims or defenses.

Pursuant to Rule 26(a)(1)(A)(iii), the Plaintiff States state that it is premature for the States to provide a computation of damages at this time, as the States’ computation of damages (and civil penalties) is highly dependent on information to be obtained from discovery during the course of this action and is not available at this time. The Plaintiff States will provide expert disclosure(s) and written report(s) related to the computation of damages as required by Rule 26(a)(2) in accordance with Pre-Trial Order No. 5.

The Plaintiff States do not have insurance agreements relevant to this matter and therefore have no disclosures under Rule 26(a)(1)(A)(iv).

The Plaintiff States additionally provide the following information:

**1. The correct names of the parties to the action.**

The Plaintiff States include the States of Texas, Alaska, Arkansas, Florida, Idaho, Indiana, Louisiana, Mississippi, Missouri, Montana, Nevada, North Dakota, South Carolina, South Dakota, and Utah, and the Commonwealths of Kentucky and Puerto Rico.

The only Defendant is Google LLC.

**2. The name and, if known, address and telephone number of any potential parties to the action.**

The Plaintiff States do not anticipate any potential additional parties, although other government enforcement agencies may seek to join or intervene in this matter.

**3. The name, and if known, the address and telephone number of persons having knowledge of facts relevant to the claim or defense of any party, a brief characterization of their connection to the case, and a fair summary of the substance of the information known by such person.**

*See Appendix A.*

**4. A copy of all documents, ESI, witness statements, and tangible things in the possession, custody, or control of the disclosing party that are relevant to the claim or defense of any party.**

Beginning on April 22, 2021, the Plaintiff States sent Defendant or caused to be sent to Defendant a copy of all documents, ESI, witness statements, and tangible things in their possession, custody, or control that are relevant to their claims.

Dated: January 13, 2023

Respectfully submitted,

*/s/ Ashley Keller*

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*/s/ W. Mark Lanier*

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Dakota, South Carolina, and South Dakota, and On behalf of all Plaintiff States*

**APPENDIX A****A. Individuals who likely have discoverable information that the Plaintiffs may use to support their claims or defenses.**

Below is a list of individuals and entities who the Plaintiff States, at this time, believe are likely to have discoverable information that the Plaintiff States may use to support their claims or defenses. Other individuals and entities not named below—including other Google customers, competitors, and employees—may also have discoverable information, and the Plaintiff States reserve the right to supplement this list as discovery proceeds.

1.	<b>Name:</b>	Employees of AdButler, <i>including</i> [REDACTED] (Founder)
	<b>Counsel/Contact:</b>	[REDACTED]
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

2.	<b>Name:</b>	Employees of Adobe, <i>including</i> [REDACTED] (Head of Product, Adobe Advertising)
	<b>Address:</b>	345 Park Avenue San Jose, CA 95110 USA
	<b>Counsel/Contact:</b>	c/o Michael Van Arsdall
	<b>Telephone Number:</b>	(202) 912-5072
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad buying tool market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

3.	<b>Name:</b>	Employees of Altice, <i>including</i> [REDACTED] (Chief Operating Officer, Altice USA News & Advertising)
	<b>Address:</b>	1 Court Square West Long Island City, NY 11101 USA

	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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33.	<b>Name:</b>	Employees of Kranzler Kingsley Communications Ltd, <i>including</i> [REDACTED] (President)
	<b>Address:</b>	505 East Main Avenue Suite 250 Bismarck, ND, 58501 USA
	<b>Counsel/Contact:</b>	[REDACTED]
	<b>Telephone Number:</b>	(701)255-3067
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

34.	<b>Name:</b>	Employees of Liftable Media, <i>including</i> [REDACTED] (President)
	<b>Address:</b>	41810 North Venture Drive Anthem, AZ 85086 USA
	<b>Counsel/Contact:</b>	c/o William J. Olson
	<b>Telephone Number:</b>	703-356-5070
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

35.	<b>Name:</b>	Employees of Magnite f/k/a The Rubicon Project, <i>including</i> [REDACTED] (Chief Technology Officer)
	<b>Address:</b>	12181 Bluff Creek Drive Playa Vista, CA 90094 USA
	<b>Counsel/Contact:</b>	c/o Jonathan Kanter
	<b>Telephone Number:</b>	(202) 455-4251

42.	<b>Name:</b>	Employees of News Media Alliance, <i>including</i> [REDACTED] [REDACTED] (Senior Vice President and General Counsel)
	<b>Address:</b>	4401 North Fairfax Drive, Suite 300 Arlington, VA 22203 USA
	<b>Counsel/Contact:</b>	c/o Jonathan Kanter
	<b>Telephone Number:</b>	(202) 455-4251
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

43.	<b>Name:</b>	Employees of News Media Association, <i>including</i> [REDACTED] [REDACTED] (Chief Executive)
	<b>Address:</b>	Second Floor 16 - 18 New Bridge Street London EC4V 6AG UK
	<b>Counsel/Contact:</b>	[REDACTED]
	<b>Telephone Number:</b>	44 (0) 203 848 9620
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

44.	<b>Name:</b>	Employees of Nike, <i>including</i> [REDACTED] [REDACTED] (Director of Digital Marketing)
	<b>Address:</b>	One Bowerman Drive Beaverton, OR 97005 USA
	<b>Counsel/Contact:</b>	[REDACTED] Senior Counsel
	<b>Telephone Number:</b>	(971) 473-1347
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct



45.	<b>Name:</b>	Employees of Omnicom, <i>including</i> [REDACTED] (COO), George Manas (President, CMO for North America)
	<b>Address:</b>	437 Madison Avenue New York, NY 10022 USA
	<b>Counsel/Contact:</b>	c/o Joshua H. Epstein
	<b>Telephone Number:</b>	(212) 468-4869
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

46.	<b>Name:</b>	Employees of OpenX, <i>including</i> [REDACTED] (President and Chief Executive Officer)
	<b>Address:</b>	888 East Walnut Street, 2nd Floor Pasadena, CA 91101 USA
	<b>Counsel/Contact:</b>	c/o Jonathan Kanter
	<b>Telephone Number:</b>	(202) 455-4251
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

47.	<b>Name:</b>	Employees and Representatives of Oracle, <i>including</i> [REDACTED] (Executive Vice President), [REDACTED] (Vice President), [REDACTED] (Director, State Government Affairs), [REDACTED] (Senior Policy Advisor)
	<b>Address:</b>	500 Oracle Parkway Redwood Shores, CA 94065 USA
	<b>Counsel/Contact:</b>	[REDACTED] Senior Managing Counsel
	<b>Telephone Number:</b>	(650) 506-9534
	<b>Subject(s):</b>	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct